

1 JASON M. FRIERSON  
2 United States Attorney  
3 District of Nevada  
4 Nevada Bar No. 7709

5 TROY K. FLAKE  
6 Assistant United States Attorney  
7 501 Las Vegas Blvd. So., Suite 1100  
8 Las Vegas, Nevada 89101  
9 (702) 388-6336  
10 Troy.Flake@usdoj.gov

11 *Attorneys for the United States*

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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 Pamela Brown, Individually, and as Special  
17 Administratrix of the Estate of James  
18 Brown,

19 Case No. 2:20-cv-01814-CDS-DJA

20 Plaintiffs,

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26 **Stipulation to Extend Remaining  
27 Deadlines (Sixth Request)**

28 v.

29 United States of America,  
30  
31 Defendant.

32 Pursuant to Local Rule 26-4 and Local Rule IA 6-1, the parties respectfully request  
33 a 60-day extension of the remaining deadlines. This is the sixth request for an extension of  
34 time.

35  
36 **A. Discovery completed to date**

37 This is a complex medical malpractice wrongful death case. The parties have  
38 provided disclosures, exchanged written discovery, including numerous medical records,  
39 and subpoenaed multiple third parties. The parties have deposed the plaintiff, other family  
40 members of the decedent, and three of the medical providers who treated the decedent. The  
41 deadlines for amendment and to add parties have passed. The parties have closely  
42 cooperated to move discovery forward.

1                   **B. Remaining Discovery**

2                   The parties have completed fact witness depositions and written discovery. The  
3 main task remaining in discovery is conducting the expert witness deposition of Plaintiff's  
4 expert, Dr. MacGregor.

5                   **C. Reasons for Requested Extension**

6                   Plaintiff's expert, Dr. MacGregor has a demanding schedule and limited  
7 availability. The parties cooperated to find mutually agreeable dates for his deposition and  
8 scheduled it for November 4, 2022. Unfortunately, counsel for the United States' father  
9 passed away on October 28, 2022, and he was required to cancel the deposition to attend  
10 the funeral. Dr. MacGregor and Plaintiff's counsel have been accommodating, but the  
11 parties have been unable to find another date for the deposition within the discovery  
12 period.

13                  Given the approaching holidays and various scheduling conflicts, the parties  
14 respectfully request an additional 60 days to complete Dr. MacGregor's deposition. They  
15 are seeking this extension in good faith and without purpose of delay.

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1                   **D. Proposed revised discovery schedule**

	<b>Current due date</b>	<b>Proposed due date</b>
Discovery Cut-Off	November 22, 2022	January 23, 2023
Dispositive Motions	December 27, 2022	February 27, 2023
Pre-Trial Order	January 23, 2022	March 20, 2023

8                   Respectfully submitted this 21st day of November 2022.

10                  LAIRD LAW, PLLC

11                  \_\_\_\_\_  
12                  /s/ *Danial Laird*  
13                  DANIAL LAIRD  
14                  The Riley Building  
15                  4175 S. Riley St., Ste. 102  
16                  Las Vegas, NV 89147

17                  \_\_\_\_\_  
18                  *Attorney for Plaintiff*

10                  JASON M. FRIERSON  
11                  United States Attorney

12                  \_\_\_\_\_  
13                  /s/ *Troy K. Flake*  
14                  TROY K. FLAKE  
15                  Assistant United States Attorney

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17                  *Attorney for the United States*

18                  IT IS SO ORDERED.

19                  \_\_\_\_\_  
20                  UNITED STATES MAGISTRATE JUDGE

21                  \_\_\_\_\_  
22                  DATED: 11/23/2022